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Attorney for Defendant – EDUARDO WENDLANDT-RAMIREZ

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA  
\* \* \*

10 UNITED STATES OF AMERICA, ) 2:23-MJ-00251-EJY  
11 )  
12 Plaintiff, )  
13 v. ) 8<sup>th</sup> Request  
14 EDUARDO WENDLANDT-RAMIREZ, )  
15 )  
16 Defendant. )  
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17 **STIPULATION AND ORDER TO CONTINUE PRELIMINARY EXAMINATION**

19 IT IS HEREBY STIPULATED AND AGREED by and between OSVALDO E. FUMO,  
20 ESQ., Counsel for Defendant EDUARDO WENDLANDT-RAMIREZ and EDWARD G  
21 VERONDA, Assistant United States Attorney, that Preliminary Examination currently  
22 scheduled for May 28, 2024 at 4:00 p.m., be vacated and reset to a date and time convenient to  
23 the court but no earlier than forty-five (45) days.

24 This Stipulation is entered into for the following reasons:

- 25 1. Counsel has spoken to Defendant and he has no objection to the request for  
26 continuance.  
27 2. Defendant is currently out on pretrial release.  
28

- 1       3. Counsel for defendant has spoken to AUSA and he has no objection to the  
2       continuance.
- 3       4. Counsel and Government are continuing to explore a pre-indictment plea, and  
4       continue to have discussions on a pre-indictment resolution.
- 5       5. Counsel needs additional time to adequately review the case and/or resolve the  
6       matter.
- 7       6. Denial of this request for continuance could result in a miscarriage justice.
- 8       7. For all the above-stated reasons, the ends of justice would best be served by a  
9       continuance of the Preliminary Examination until a date and time convenient to the  
10      court.

13      This is the 8<sup>th</sup> request for continuance filed herein.

14      DATED: May 21, 2024

17      /s/ Osvaldo E. Fumo Esq.  
18      OSVALDO E. FUMO, ESQ.  
19      601 Las Vegas Boulevard, South  
20      Las Vegas, Nevada 89101  
21      ATTORNEY FOR THE DEFENDANT  
22      EDUARDO WENLANDT-RAMIREZ

17      /s/ Edward G. Veronda, Esq.  
18      EDWARD G. VERONDA, ESQ.  
19      ASSISTANT UNITED STATES ATTORNEY  
20      501 LAS VEGAS BOULEVARD SOUTH. #1100  
21      LAS VEGAS, NEVADA 89101  
22      ATTORNEY FOR UNITED STATES OF  
23      AMERICA

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2                   UNITED STATES DISTRICT COURT  
3                   DISTRICT OF NEVADA  
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6                   UNITED STATES OF AMERICA,         )       2:23-MJ-00251-EJY  
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**FINDINGS OF FACT**

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Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds:

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This Stipulation is entered into for the following reasons:

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1. Counsel has spoken to Defendant and he has no objection to the request for continuance.
2. Defendant is currently out on pretrial release.
3. Counsel for defendant has spoken to AUSA and he has no objection to the continuance.
4. Counsel and Government are continuing to explore a pre-indictment plea, and continue to have discussions on a pre-indictment resolution
5. Counsel needs additional time to adequately review the case and/or resolve the matter.
6. Denial of this request for continuance could result in a miscarriage justice.
7. For all the above-stated reasons, the ends of justice would best be served by a

1 continuance of the Preliminary Examination until a date and time convenient to the  
2 court.

3 This is the 8<sup>th</sup> request for continuance filed herein.  
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6 **CONCLUSIONS OF LAW**

7 Denial of this request for continuance would deny the parties herein the opportunity  
8 to effectively and thoroughly prepare for Preliminary Examination.

9 Additionally, denial of this request for continuance could result in a miscarriage of  
10 justice.  
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12 **ORDER**  
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14 IT IS HEREBY ORDERED that the Preliminary Examination currently scheduled  
15 for May 28, 2024, at 4:00 p.m., be continued to the 11th day of July, 2024, at 4:00 p.m. in  
16 Courtroom 3D.  
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18 DATED this 21st day of May, 2024.  
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21 U.S. MAGISTRATE JUDGE  
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